

FILED
DISTRICT COURT OF GUAM
FEB - 7 2006
MARY L.M. MORAN
CLERK OF COURT

**IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM**

DECLARATION OF KARON V. JOHNSON

I, KARON V. JOHNSON, declare that:

1. I am the Assistant U.S. Attorney who represents plaintiff in this action.
2. Defendant, \$3,700.00 in United States Currency was seized from the person of Pi-Ju
upon her arrest for alien smuggling on August 8, 2005.
3. The defendant, \$3,700.00 in United States Currency constitutes proceeds traceable to a
violation of Title 8, United States Code, § 1324(a)(2)(B)(ii) and is, therefore, subject to forfeiture
by the United States pursuant to Title 8, United States Code, § 1324(b).
3. According to available records and my best information and belief, the defendant, nor
her son Pi-Ju WU, is not an infant or incompetent person and is not in the military service of

1 the United States within the meaning of the Soldier's and Sailor's Civil Relief Act of 1940, as
2 amended, or otherwise entitled to the benefits of said Act.

3 4. A copy of the Verified Complaint, Warrant of Arrest and Notice of Arrest was served
4 by hand-delivery service, on December 28, 2005, to the attorney of record for Pi-Ju WU, John F.
5 Gorman. See attachment "A", Certificate of Service.

6 5. Pi-Ju Wu, through her attorney of record, John T. Gorman, has failed to appear or file
7 an answer within the time required by law.

8 6. The default of defendant herein and judgment against the sum of \$3,700.00 United
9 States Currency as prayed for in the complaint should be entered.

10 I declare under penalty of perjury that the foregoing is true and correct to the best of my
11 knowledge.

12 Executed: 7/7/06, at Hagåtña, Guam.

Karon V. Johnson
KARON V. JOHNSON
Assistant U.S. Attorney

1 \$3,700.COS
2 LEONARDO M. RAPADAS
3 United States Attorney
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DISTRICT COURT OF GUAM

DEC 28 2005

MARY L.M. MORAN
CLERK OF COURT

RECEIVED

DEC 28 2005

FEDERAL PUBLIC DEFENDER
DISTRICT OF GUAM

9
10 IN THE UNITED STATES DISTRICT COURT
11
12 FOR THE DISTRICT OF GUAM

13 UNITED STATES OF AMERICA,) CIVIL CASE NO. 05-00040
14 Plaintiff,)
15 vs.) CERTIFICATE OF SERVICE
16 \$3,700.00 UNITED STATES)
17 CURRENCY,)
18 Defendant.)
19

20 I, KARON V. JOHNSON, Assistant U.S. Attorney for the Districts of Guam and the
21 NMI, hereby certify that on the 28th day of December, 2005, I caused to be served by hand-
22 delivery, a copy of the following documents in the above-referenced case: **Verified Complaint**
23 **of Forfeiture, Warrant of Arrest in Rem, and Notice of Arrest**, to the attorney of record
24 for Pi-Ju WU as follows: John T. Gorman, Federal Public Defender, First Hawaiian Bank Bldg.,
25 400 Rt. 8, Suite 501, Mongmong, Guam 96910.

26 DATED: 12/27/05-

27
28
KARON V. JOHNSON
Assistant U.S. Attorney

ENTERED
[Signature]